

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

Emily Doe,	)	Civil Action No.:
	)	
Plaintiff	)	
vs.	)	
	)	
American University of Antigua, Inc.,	)	<b>PLAINTIFF’S RESPONSES TO LOCAL</b>
	)	<b>RULE 26.01 INTERROGATORIES</b>
Defendant.	)	
	)	

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Plaintiff Emily Doe (hereafter “Emily”) submit the following responses to the Interrogatories required by Local Rule 26.01:

- (A) State name and address and telephone number all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

**RESPONSE:** None of which Plaintiff is aware.

- (B) As to each claim, state whether it should be tried jury or nonjury and why.

**RESPONSE:** Plaintiff does not request a jury trial at present.

- (C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**RESPONSE:** Not applicable.

- (D) State the facts for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**RESPONSE:** The hospital with which Defendant is affiliated for purposes of certain of the actions which form the basis for the claims herein is located in Horry County.

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provided: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE:** This action is not related to any other matter filed in this District.

- (F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct information.

**RESPONSE:** Not applicable.

- (G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

**RESPONSE:** Not applicable.

s/ Desa Ballard  
Desa Ballard (ID# 1179)  
Harvey M. Watson III (ID# 9271)

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ATTORNEYS FOR PLAINTIFF